

1 JONATHAN O. PENA, ESQ.
2 CA Bar ID No. 278044
3 Peña & Bromberg, PLC
4 2440 Tulare St., Suite 320
5 Fresno, CA 93721
6 Telephone: 559-412-5390
7 Fax: 866-282-6709
8 info@jonathanpena.com
9 Attorney for Plaintiff

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JUAN ANDRADE,) Case No. 1:22-cv-00861-EPG
Plaintiff,) STIPULATION AND ORDER FOR
vs.) EXTENSION OF TIME
KILOLO KIJAKAZI, Acting) (ECF No. 14)
Commissioner of Social Security,)
Defendant.)
)

IT IS HEREBY STIPULATED, by and between the parties through their respective
counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time,
from January 4, 2023 to March 6, 2023, for Plaintiff to serve on defendant with Plaintiff's
Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be
extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the
requested extension. For the weeks of December 26, 2022 and January 2, 2023, Counsel
currently has 16 merit briefs, and several letter briefs and reply briefs. Additional time is needed
to thoroughly brief this matter for the Court.

1 Counsel for Plaintiff is currently taking partial leave as his child was born on October 14,
2 2022. Thus, Counsel is working limited hours for the months of December 2022 through
3 February 2023 (with a possible extension of parental leave). Lastly, Counsel for the Plaintiff has
4 pre-planned Christmas vacation during the last two weeks of the year, with limited access to the
5 computer.

6 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant
7 and Court for any inconvenience this may cause.

8
9 Respectfully submitted,

10 Dated: December 23, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

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12 By: /s/ Jonathan Omar Pena
13 JONATHAN OMAR PENA
14 Attorneys for Plaintiff

15 Dated: December 23, 2022 PHILLIP A. TALBERT
16 United States Attorney
17 MATHEW W. PILE
18 Associate General Counsel
19 Office of Program Litigation
20 Social Security Administration

21 By: */s/ Oscar Gonzalez de Llano
22 Oscar Gonzalez de Llano
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on Dec. 23, 2022)

ORDER

Based on the above stipulation (ECF No. 14), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment by no later than March 6, 2023. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **December 27, 2022**

/S/ Eric P. Grujic

UNITED STATES MAGISTRATE JUDGE